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**RECEIVED** Received

January 14, 2005

JAN 14 2005

JAN 18 2005

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Federal Communications Commission  
Office of Secretary Policy Branch  
International Bureau

**BY HAND DELIVERY**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

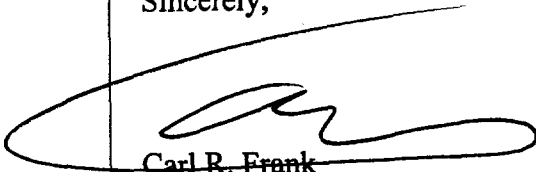
SAT-PDR-20041228-00231  
Intelsat, Ltd.

Re: *Supplemental Submission*  
Intelsat, Ltd., Petition for Declaratory Ruling that Intelsat, Ltd. Complies  
with Section 621(5)(F) of the ORBIT Act  
File No. SAT-MS-\_\_\_\_\_

Dear Ms. Dortch:

Intelsat, Ltd. ("Intelsat"), by its attorneys, hereby submits a supplement to its Petition for Declaratory Ruling that Intelsat, Ltd. Complies with Section 621(5)(F) of the ORBIT Act (and its attached Certification of Intelsat, Ltd.), which was filed on December 23, 2004. Specifically, Intelsat updates its Certification to reflect the Commission's decision to approve Intelsat's transaction with Zeus Holdings Limited.<sup>1</sup>

Sincerely,

  
Carl R. Frank  
Counsel to Intelsat, Ltd.

Enclosure  
cc: Roderick Porter

<sup>1</sup> See *Intelsat, Ltd. and Zeus Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations and Petition for Declaratory Ruling Under Section 310 of the Communications Act of 1934, As Amended, Order and Authorization, DA 04-4034* (Int'l Bur. rel. Dec. 22, 2004).

**CERTIFICATION OF INTELSAT, LTD.**

I, Conny L. Kullman, Chief Executive Officer of Intelsat, Ltd. ("Intelsat"), declare under penalty of perjury as follows:

(i) Upon consummation of Intelsat's transaction with Zeus Holdings Limited (the "Zeus Transaction"), which the Federal Communications Commission ("FCC") approved by Order dated December 22, 2004 (DA 04-4034), Intelsat will achieve substantial dilution of the aggregate amount of former signatory financial interest in Intelsat;

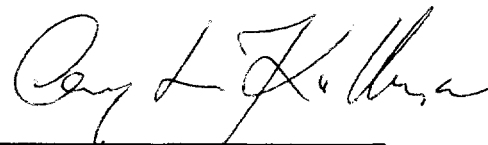
(ii) Upon consummation of the Zeus Transaction, which the FCC approved on December 22, 2004 (DA 04-4034), any signatories or former signatories that retain a financial interest in Intelsat will not possess, together or individually, effective control of Intelsat;

(iii) Upon consummation of the Zeus Transaction, which the FCC approved on December 22, 2004 (DA 04-4034), no intergovernmental organization will have any ownership interest in a successor entity of Intelsat; and

(iv) I have read the foregoing Petition for Declaratory Ruling that Intelsat, Ltd. Complies with Section 621(5)(F) of the ORBIT Act. The representations contained therein are true and correct.

Intelsat, Ltd.

By:



Conny L. Kullman  
Chief Executive Officer of Intelsat, Ltd.

Executed on: January 13, 2005